

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
Use of N11 Codes and Other)	FCC Docket No. 04-111
Abbreviated Dialing Arrangements)	
)	
)	

COMMENTS OF THE IOWA UTILITIES BOARD

Introduction

On May 14, 2004, the Federal Communications Commission (FCC) released a notice of proposed rulemaking entitled *The Use of N11 Codes and Other Abbreviated Dialing Arrangements*, Docket No. FCC 04-111. The FCC is seeking comment on various issues relating to the One Call options and on the recommendations and concerns raised by the North American Numbering Council (NANC) regarding the use of an N11 code for access to One Call Centers.

Discussion

The Iowa Utilities Board believes that the best alternative, the alternative that would be the quickest, least expensive and most effective way to provide nationwide, toll-free access to One Call Centers would be through a nationwide ten-digit mnemonic toll-free telephone number. There are five states that currently use a single ten-digit mnemonic toll-free number, 888-DIG-SAFE, to access their One Call Centers. This solution would require Congress amending

the Pipeline Safety Act to allow for a ten-digit number rather than the currently specified three-digit number. This solution would conserve a scarce national resource; that of an N11 code, in particular 811.

The use of an N11 code is a distant second-best solution. An N11 code would satisfy the Pipeline Safety Act's specific requirement of using a three-digit number and could be implemented without substantial cost or delay of switch development required of other three-digit alternatives. However, this would necessitate the using of the last practical and available N11 code that may be more appropriate for other future needs.

July 8, 2004

Respectfully submitted,

Iowa Utilities Board
350 Maple Street
Des Moines, Iowa 50319
Voice: (515) 281-4034
Fax: (515) 281-5329
E-mail: john.ridgway@iub.state.is.us

_____/s/_____
John Ridgway
Telecommunications Mgr.

_____/s/_____
Dennis Rosauer
Utility Specialist